

### REMARKS

Applicants respectfully request reconsideration of this application. Claims 13-22 and 27-31 were pending. Claims 13, 17-18, 22, 27, and 31 have been amended. Claims 16, 21, and 30 have been canceled without prejudice. No claims have been added. Claims 13-15, 17-20, 22, 27-29, and 31 remain pending.

Claims 13-22 and 27-31 are rejected under 35 U.S.C. §103(a) as being unpatentable over Graves et al. (US 6,999,677 B2) in view of Fee et al. (US 6,980,736 B1). Claims 16, 21, and 30 have been canceled without prejudice, thus obviating the rejection. Applicant respectfully traverses the rejection of the remaining claims.

Claim 13 as amended sets forth:

a wavelength switch module (WSM) comprising  
    a plurality of input ports,  
    a plurality of output ports, and  
    a plurality of channels, each coupling a distinct one of the plurality of  
input ports to a distinct one of the plurality of output ports, wherein a distinct wavelength  
is designated to a respective one of the plurality of channels;  
    an optical transceiver, detachably coupled to the WSM, to send a first optical signal to the WSM and to detect a second optical signal received from the WSM after sending the first optical signal, wherein the optical transceiver comprises an encoder to put an identification into the first optical signal to send with the first optical signal to the WSM, and wherein the WSM is operable to send an interrupt in response to detection of a change in the first optical signal received from the optical transceiver; and  
    a set of one or more processors coupled to the WSM to look up a *configuration table* to determine which WSM sent the interrupt, to look up a *physical location table* to determine which port of the WSM identified is affected, and to automatically determine whether the second optical signal corresponds to the first optical signal in response to the identification from the optical transceiver and the interrupt from the WSM.  
(Claim 13 as amended; emphasis added)

In contrast, neither Graves nor Fee, alone or in combination, teaches the above noted limitations. Graves in general discloses a protection switching arrangement for an optical switching system (Graves, Abstract). Specifically, Graves discloses establishing a

test path between a test source and a test receiver and through the faulty switch plane for the purpose of exercising the switch plane to determine the nature of the failure (Graves, col. 7, ln. 10-16). Graves does not teach a set of one or more processors coupled to the WSM to look up a *configuration table* to determine which WSM sent the interrupt, to look up a *physical location table* to determine which port of the WSM identified is affected.

Likewise, Fee also fails to teach the above noted limitations. Fee discloses a supplemental signal comprising a unique tag that identifies the optical signal generated by a transmitter, and the unique tag may be detected by low-bandwidth detectors coupled to the optical path (Fee, col. 9, ln. 28-32). Fee does not teach a set of one or more processors coupled to the WSM to look up a *configuration table* to determine which WSM sent the interrupt, to look up a *physical location table* to determine which port of the WSM identified is affected.

Because neither Graves nor Fee, alone or in combination, teaches all limitations set forth in claim 13 as amended, claim 13 is patentable over Graves in view of Fee. Withdrawal of the rejection is respectfully requested.

Claims 18 and 27 are patentable over Graves in view of Fee for at least the reason discussed above with respect to claim 13. Claims 14-15, 17, 19-20, 22, and 28-29, and 31 depend, directly or indirectly, from claims 13, 18, and 27, respectively, and thus, are also patentable over Graves in view of Fee. Withdrawal of the rejection is respectfully requested.

### CONCLUSION

Applicant respectfully submits that the rejections have been overcome by the amendments and the remarks, and that the pending claims are in condition for allowance. Accordingly, Applicant respectfully requests the rejections be withdrawn and the pending claims be allowed.

If the Examiner perceives further obstacles in allowing the present application, the Examiner is invited to contact the undersigned representative of Applicant to resolve such obstacles, if any.

Pursuant to 37 C.F.R. §1.136(a)(3), Applicant hereby requests and authorizes the U.S. Patent and Trademark Office to (1) treat any concurrent or future reply that requires a petition for extension of time as incorporating a petition for extension of time for the appropriate length of time and (2) charge all required fees, including extension of time fees and fees under 37 C.F.R. 1.16 and 1.17, to Deposit Account No. 02-2666.

Respectfully submitted,  
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